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Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001
Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

Document: EPA-R03-OW-2010-0736-0138
Comment submitted by W. Frank Patterson, Jr., Shepherd's Haven Farm

Submitter Information

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General Comment

I am very concerned about the heavyhanded EPA approach to the Chesapeake Bay. There has been a focus on the bay for years, yet as I understand it, the modelling for the bay is not very good. In today world, with the computer power we have available, that is not acceptable when you consider the impact this requirement will have on our communities. First, you need to have an appropriate model to understand the cost and benefit of any planned improvements.

Honestly, the approach used by EPA smells too much like the animal rights approach. We are going to drive the livestock farmers out of business and force everyone to become vegetarians and Vegans like them. They are famous for telling things that are part truths and applying them falsely to animal farming and your use of poor modeling is going to do the same thing. You are going to drive farmers out-of-business with incomplete data and part truths. In fact you have not accounted for a lot of work that has already been done in our state.

I am a sheep farmer and have used cost-share programs to set up rotational grazing and fense-out practices. However, some of my land is in the flood plains of Hays Creek and it is cost prohibitive to maintain fencing in those areas. USDA has excellent programs to enforce good conservation practices and use no-till planting on all my land. So I am supportive of good conservation measures and you are welcome to come look at my approach to witness the same. But what you are doing is trying to drive livestock farming out of the valley of Virginia and I think that is very wrong.

So, help get the model right and then understand what the true benefits and costs are before you do this heavy handed stuff. Too many of EPA personnel live in this watershed and are not being very objective about the process and desired outcome. I am not opposed to good environmental stewardship, just poorly applied plans that cost the livestock industry severely.